

RESTRICTED – ATTORNEYS’ EYES ONLY

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FUNDAMENTAL INNOVATION
SYSTEMS INTERNATIONAL LLC,

Plaintiff,

vs.

LG ELECTRONICS, INC., et al.,

Defendants.

Case No. 2:16-CV-01425-JRG-RSP

LEAD CASE

FILED UNDER SEAL

FUNDAMENTAL INNOVATION
SYSTEMS INTERNATIONAL LLC,

Plaintiff,

vs.

HUAWEI DEVICE USA, INC. and
HUAWEI DEVICE CO., LTD.,

Defendants.

Case No. 2:16-CV-01424-JRG-RSP

**DECLARATION OF JONATHAN K. WALDROP IN SUPPORT OF
LG’S MOTION TO EXCLUDE CERTAIN OPINIONS OF
FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC’S
DAMAGES EXPERT MARK CHANDLER**

I, Jonathan K. Waldrop, declare as follows:

1. I am a Partner with the law firm of Kasowitz Benson Torres LLP and am one of the attorneys responsible for the representation of Defendants LG Electronics Inc., LG Electronics U.S.A., Inc., LG Electronics MobileComm U.S.A., Inc., LG Electronics Mobile Research U.S.A., LLC, and LG Electronics Alabama, Inc. in this matter. I make this declaration in support of LG's Motion to Exclude Certain Opinions of Fundamental Innovation Systems

International LLC's Damages Expert Mark Chandler. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt from the Expert Report of Mark J. Chandler, served June 13, 2018.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Supplemental Expert Report on Licensing of Mark J. Chandler, served July 18, 2018.

4. Attached hereto as Exhibit 3 is a true and correct copy of an excerpt from deposition transcript of Mark Chandler, taken July 31, 2018.

5. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt from the Expert Report of Roy Weinstein, served June 13, 2018.

6. Attached hereto as Exhibit 5 is a true and correct copy of an excerpt from deposition transcript of Roy Weinstein, taken August 1, 2018.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Supplemental Expert Report of Roy Weinstein, served July 18, 2018.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief, formed after reasonable inquiry under the circumstances.

Executed on the 21st day of August, 2018, in Redwood Shores, California.

/s/ Jonathan K. Waldrop
Jonathan K. Waldrop